

**REMARKS/ARGUMENTS**

Reexamination of the captioned application is respectfully requested.

**A. SUMMARY OF THIS AMENDMENT**

By the current amendment, Applicants basically:

1. Amend independent claims 1 and 11.
2. Cancel claims 6 and 12 without prejudice or disclaimer.
3. Respectfully traverse all prior art rejections.
4. Request a one month extension of time. .

**B. PATENTABILITY OF THE CLAIMS**

Claims 1-2, 5, 10-11, 16 and 18 stand rejected under 35 USC §103(a) as being unpatentable over U.S. Patent 7,139,556 to Marley in view of WO 01/28273 to Lammi et al. Claims 3, 4, 13 and 14 stand rejected under 35 USC §103(a) as being unpatentable over U.S. Patent 7,139,556 to Marley in view of WO 01/28273 to Lammi et al and further in view of U.S. Publication 2003/0115201 to Krishnamoorthy. Claims 6-8, 12 and 17 stand rejected under 35 USC §103(a) as being unpatentable over U.S. Patent 7,139,556 to Marley in view of WO 01/28273 to Lammi et al and further in view of EP 1081916 to King. Claims 9 and 15 stand rejected under 35 USC §103(a) as being unpatentable over U.S. Patent 7,139,556 to Marley in view of WO 01/28273 to Lammi et al and further in view of U.S. Publication 2003/0016823 to Chung. All prior art rejections are respectfully traversed for at least the following reasons.

Applicant's independent claims are directed to protecting user data from being supplied to unauthorized service providers (*see*, for example, specification page 4, lines 4-11). In contrast, newly applied Morley discloses a solution for providing location dependent services, with the object of protecting the user's identity in a mobile network from being revealed to any service providers.

Morley describes that a service request from a user to an application service provider "ASP" is intercepted by the network. The network then generates (step C) an encoded or encrypted "user tag" comprising identifications of the user and the ASP who needs to know the location of the user (*see, e.g.,* Moreley cal. 3, lines 35-45). Morley also mentions (col. 4, lines 46-50) that the tag could be a random number associated with "the specific four components", which includes the user and ASP identifications.

The Morley network then passes the user tag to the ASP (step D) without revealing the user's identity. The ASP can then obtain location information from the network referring to the received user tag (steps E,F).

However, Morley does not check whether the ASP is authorized to receive the requested location information. Any ASP could thus send a user data request to the network, referring to the user tag, and receive user data regardless of whether that ASP is allowed to see that user data or not. Therefore, the Morley user has no control of what data is disclosed to whom. From applicant's perspective, Morley thus has a severe disadvantage.

Both Lammi and Marley protect the user's identity from being revealed to the service provider. The technology of Applicant's independent claims, on the other hand, protect user data from being supplied to unauthorized service providers. Applicant's technology is not taught or suggested in either Lammi or Marley. Therefore, the skilled person cannot arrive at the claimed invention by combining the teachings of Lammi and Marley.

**C. MISCELLANEOUS**

In view of the foregoing and other considerations, the Examiner has ample bases for withdrawing all rejections and for allowance of all pending claims. Accordingly, a formal indication of allowance is earnestly solicited.

The Commissioner is authorized to charge the undersigned's deposit account #14-1140 in whatever amount is necessary for entry of these papers and the continued pendency of the captioned application.

Should the Examiner feel that an interview with the undersigned would facilitate allowance of this application, the Examiner is encouraged to contact the undersigned.

Respectfully submitted,

**NIXON & VANDERHYE P.C.**

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